

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

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|-----------------|---|------------------|
| IN RE | : | CHAPTER 13 |
| PABLO CELEDONIO | : | |
| | : | |
| Debtor(s) | : | No. 23-11453 amc |

**DEBTOR'S ANSWER TO THE MOTION FOR RELIEF FILED BY PERITUS
PORTFOLIO SERVICES II, LLC**

COMES NOW, Pablo Celedonio, Debtor and Respondent, through counsel of record, Michele Perez Capilato, Esquire, and submits the following in response to the Motion for Relief from the Automatic Stay filed herein:

1. Admitted.
2. Admitted.
3. DENIED.
4. DENIED. Debtor acknowledges falling behind with post-petition payments to Movant due to a temporary loss of income. However, Debtor disputes the amount of arrears alleged by Movant and believes he has made payments that have not been properly credited to his account. Debtor is presently gathering proofs of payment and will promptly forward to counsel. Debtor would like to enter into a Stipulation with Movant to resolve the remaining post-petition arrears.
5. Admitted.
6. Admitted.
7. DENIED. Debtor lacks sufficient information, knowledge, or belief to admit or deny this statement, therefore, it is denied.
8. DENIED.
9. Debtor can neither admit nor deny this statement, therefore, it is DENIED.
10. DENIED.

WHEREFORE, Debtor/Respondent prays that Movant's Motion be DENIED, and that Debtor/Respondent receive judgment for reasonable costs and attorney fees incurred in connection with the defense of this Motion.

April 3, 2024

Respectfully submitted,

Law Offices of Michele Perez Capilato

By: /s/ Michele Perez Capilato

Michele Perez Capilato, Esquire

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